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12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 SYLVIA ZORSCH,

16 Case No.: 2:17-cv-03121-APG-NJK

17 Plaintiff,

**RENEWED STIPULATION TO
EXTEND DEADLINE TO FILE
RESPONSIVE PLEADING**

18 vs.

19 **(FIRST REQUEST)**

20 EQUIFAX INFORMATION SERVICES, LLC,
21 MORTGAGE SERVICE CENTER, SILVER
22 STATE SCHOOLS CREDIT UNION, AND
23 TOYOTA FINANCIAL SERVICES,

24 Defendants.

25 Plaintiff, Sylvia Zorsch (“Plaintiff”), and Defendant, Silver State Schools Credit Union
26 (“SSSCU”) (collectively the “Parties”), by and through their counsel of record, hereby stipulate
and agree as follows:

27 On December 27, 2017, Plaintiff filed her Complaint [ECF No. 1]. SSSCU was served
28 with Plaintiff’s Complaint on January 2, 2018. Presently, SSSCU’s responsive pleading is due by
January 23, 2018. The Parties have discussed extending the deadline for SSSCU to respond to
the complaint. Prior to the deadline the parties had reached an agreement to extend the deadline
to February 6, and had prepared a stipulation to that effect, the form of which Plaintiff approved.
Unfortunately, SSSCU’s counsel inadvertently did not file the Stipulation.

29 When SSSCU caught the mistake, it emailed Plaintiff and received her consent to file the
30 stipulation on February 1, 2018 [ECF No. 12]. Because it was filed late and did not provide

1 excusable neglect for the late filing, as well as an explanation for the need for the extension, the
2 Court denied the stipulation without prejudice [ECF No. 14]. Prior to catching the error in the
3 filing, the parties had agreed to extend the time for SSSCU to respond to the Complaint to
4 February 20, 2018. The parties seek this extension to explore the factual issues of the case and
5 discuss possible resolution of the claims.

6 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for SSSCU to
7 file its responsive pleading by four weeks to February 20, 2018.

8 This is the first stipulation for extension of time for SSSCU to file its response to
9 Plaintiff's Complaint. The extension is requested in good faith and is not for purposes of delay or
10 prejudice to any other party.

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12 DATED this 5th day of February, 2018.
13 WRIGHT, FINLAY & ZAK, LLP

14 /s/ Ramir M. Hernandez
15 Dana Jonathon Nitz, Esq.
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17 Ramir M. Hernandez, Esq.
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21 Attorneys for Defendant, *Silver State Schools*
22 *Credit Union*

23 DATED this 5th day of February, 2018.
24 KNEPPER & CLARK LLC

25 /s/ Miles N. Clark
26 Matthew I. Knepper, Esq.
27 Nevada Bar No. 12796
28 Miles N. Clark, Esq.
Nevada Bar No. 13848
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Las Vegas, NV 89129
Attorneys for Plaintiff, *Sylvia Zorsch*

21 **IT IS SO ORDERED.**

22 DATED February 6 _____, 2018.

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26 U.S. MAGISTRATE JUDGE
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